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American Council of the Blind

Charles Crawford, Executive Director

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June 27, 2003

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service, CC Docket 96-45; and CC Dockets 98-171, 90-571, 92-237, 99-200, 95-116, 98-170

Dear Ms. Dortch:

As the FCC prepares to issue a final ruling on proposed changes to fund the Universal Service Fund (USF), the American Council of the Blind (ACB) would like to share with you our thoughts. As the nation's leading membership organization of blind and visually impaired people, ACB is concerned about how proposed changes in the USF funding mechanism could disproportionately harm low and fixed income consumers, many of whom are blind and visually impaired.

Universal service is very important to people with disabilities. It helps ensure the delivery of affordable and accessible telecommunications services to all Americans, including those who live in high-cost areas and/or on limited incomes, as well as to schools, libraries and rural health providers. As many Americans with disabilities live on fixed or limited incomes and are more likely to be unemployed than Americans without disabilities, ensuring the maintenance of the USF is very important to our organization.

We are very concerned that the current proposal to switch from a revenue-based universal service funding mechanism to a connection-based one would be harmful to the very population the fund seeks to help. Under a connection-based methodology, customers would be charged the same amount for universal service whether they make *one interstate phone call* or 100, e.g., a low volume residential customer would contribute the same amount as a high-volume business customer. So rather than helping provide affordable service to those that need it most, this proposal appears to ask them to contribute a disproportionate amount of the funding.

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We are also concerned about the impact of this connection-based funding mechanism on users of pre-paid wireless services. For the blind and visually impaired, wireless phones provide significant benefits including safety, security and convenience. Pre-paid wireless services, in particular, are an important product to many people with disabilities. Pre-paid wireless gives people who cannot afford or cannot qualify for regular cell phone service the opportunity to enjoy its benefits. We are troubled that changing the USF mechanism to connection-based would significantly increase the cost of pre-paid wireless companies' USF contributions which would force companies to increase the usage charges for such services. We urge you to ensure that any changes to the USF mechanism do not inadvertently raise the cost of pre-paid wireless service to the detriment of consumers who need it most.

We appreciate the opportunity to share with you our concerns and urge you to ensure that any changes to the universal service funding mechanism do not unintentionally hurt the very people universal service was created to help.

Sincerely,

A handwritten signature in cursive script that reads "Charles Crawford". The signature is written in dark ink and is positioned above the printed name and title.

Charles Crawford
Executive Director
American Council of the Blind